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Corp., Jay Irgang, Mark Irgang and Orli  
Irgang

Hearing Date: tbd

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

MAYWOOD CAPITAL CORP., *et al.*,

Debtors.

-----X

JOHN S. PEREIRA, as Chapter 11 Trustee  
of 65-67 EAST 125<sup>TH</sup> STREET REALTY  
CORP.,

Plaintiff,

v.

BRT REALTY TRUST, KENNEDY  
FUNDING, INC., BODDEN FUNDING  
CORP., JAY IRGANG, MARK IRGANG  
and ORLI IRGANG,

Defendants.

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**NOTICE OF MOTION FOR ORDER DETERMINING ADVERSARY PROCEEDING  
TO BE NON-CORE AND WITHDRAWING THE REFERENCE**

PLEASE TAKE NOTICE that upon the memorandum of law in support of Motion Of  
Bodden Funding Corp., Jay Irgang, Mark Irgang and Orli Irgang for an Order Determining  
Certain Adversary Proceedings To Be Non-Core Proceedings And Withdrawing The Reference

(the “Memorandum of Law”), the affidavit of Laurence May, Esq. sworn to on April 13, 2007 and the exhibits thereto, and upon all the pleadings and proceedings had heretofore herein, Defendants Bodden Funding Corp., Jay Irgang, Mark Irgang and Orli Irgang (the “Bodden Group”) will move before the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 157(b)(3) and 28 U.S.C. § 157(d) for an order declaring this adversary proceeding and nine related adversary proceedings to be non-core proceedings and for withdrawal of the reference.

PLEASE TAKE FURTHER NOTICE that the date, time and place of the hearing on the motion shall be determined by the United States District Judge to whom this matter is assigned, and said notice shall be provided to Plaintiff when the Court has scheduled the hearing.

DATED: New York, New York  
April 13, 2007

COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.  
A Professional Corporation  
Attorneys for Defendants, Bodden Funding  
Corp., Jay Irgang, Mark Irgang and Orli Irgang

By: /s/ Laurence May  
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